

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

BRETT MICHAEL PEPPER,  
as next friend for M.P., a minor

Plaintiff,

v

EDWARDSBURG PUBLIC SCHOOLS, RYAN  
MARKEL, KATIE VANBELLE, CODY ADKINS,  
DWAYNE ADKINS, and ~~FRANCES CORDELL~~,

Defendants.

CASE NO. 1:20-CV-00583

HON. JANET T. NEFF

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**BRIEF IN SUPPORT OF JOINT MOTION FOR LEAVE TO FILE JOINT MOTION  
FOR APPROVAL OF SETTLEMENT AGREEMENTS UNDER SEAL**

NOW COME the parties, through their counsel, SMITH HAUGHEY RICE & ROEGGE,  
KLUCZYNSKI GIRTZ & VOGELZANG, SECREST & WARDLE, and KOPKA PINKUS  
DOLIN, PC, and pursuant to L. Civ. R. 10.6, request this Court to grant leave to file the Joint

Motion for Approval of Settlement Agreements (ECF No. 67) and Brief in Support of Joint Motion for Approval of Settlement Agreements (ECF No. 68), under seal. The parties further state as follows:

The parties engaged in voluntary facilitative mediation, at which time plaintiff negotiated a confidential settlement with defendants Cody and Dwayne Adkins. Shortly after mediation, the plaintiff also negotiated a confidential settlement with Defendants, EPS, Katie VanBelle and Ryan Markel. Pursuant to Local Rule 10.6(b), plaintiff has submitted the Joint Motion for Approval of Settlement Agreements (ECF No. 67) and Brief in Support of Joint Motion for Approval of Settlement Agreements (ECF No. 68) as “proposed sealed documents.”

There is good cause for the Joint Motion for Approval of Settlement Agreements and Brief in Support of the same to be filed under seal. The Joint Motion for Approval of Settlement Agreements and Brief in Support contain information that must remain confidential pursuant to the confidential settlement agreements, and the confidential settlement agreements also include terms that involve and impact M.P., a minor. For these reasons, the Joint Motion for Approval of Settlement Agreements (ECF No. 67) and Brief in Support of Joint Motion for Approval of Settlement Agreements (ECF No. 68), should be filed under seal pursuant to L. Civ. R. 10.6.

WHEREFORE, the parties request that the Court grant leave to file the Joint Motion for Approval of Settlement Agreements (ECF No. 67) and Brief in Support of Joint Motion for Approval of Settlement Agreements (ECF No. 68), under seal.

Date: December 14, 2021

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